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Counsel for Defendant LOVRIN

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GEORGE LOVRIN,

Defendant.

No. CR 13-558 RS

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR CONTINUANCE OF  
STATUS CONFERENCE**

Date: September 17, 2013

Time: 2:30 p.m.

Court: The Honorable Richard Seeborg

The parties hereby stipulate and agree as follows:

1. This matter is currently set for a status conference on September 17, 2013 at 2:30 p.m.;
2. Defendant requests a continuance of this date. The purpose of the continuance is for effective preparation of counsel and to allow the parties to continue to negotiate a disposition in this matter. The parties are actively working to reach agreement on the case;
3. In the meantime, investigation is ongoing on the part of the defense;
4. Given that nothing is likely to happen on September 17, 2013 except the parties' request for a new date, the defendant requests a continuance due to the fact that he

1 has young children at home, and he lives in Lake County (which is a 6 hour drive  
2 round trip) and would appreciate the Court allowing a one-time continuance via  
3 paper (rather than by personal appearance);

4 5. Counsel for the government has been contacted and has no objection to the  
5 continuance;

6 6. The defense thus requests that the hearing be continued and set for a change of  
7 plea hearing on October 1, 2013 at 2:30 p.m.

8 5. Further, and in light of the foregoing, the parties stipulate and jointly request that  
9 time be excluded from the Speedy Trial Act calculations from September 17,  
10 2013 through October 1, 2013. The parties agree that the ends of justice served by  
11 granting such a continuance outweigh the best interests of the public and the  
12 defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A), (h)(7)(B)(iv).

13 IT IS SO STIPULATED.

14 Dated: September 13, 2013

15  
16 /s/  
ELIZABETH M. FALK  
ASSISTANT FEDERAL PUBLIC DEFENDER

17  
18  
19 Dated: September 13, 2013

20 /s/  
FRANK RIEBLI  
ASSISTANT UNITED STATES ATTORNEY

~~[PROPOSED]~~ ORDER

For the reasons set forth above, the hearing in the aforementioned matter is hereby  
CONTINUED from September 17, 2013 to October 1, 2013 at 2:30 p.m.

In addition, for the reasons stated above, the Court finds that an exclusion of time from  
September 17, 2013 to October 1, 2013 is warranted and that the ends of justice served by the  
continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18  
U.S.C. §3161 (h)(7)(A).

**IT IS SO ORDERED.**

DATED: 9/13/13



THE HONORABLE RICHARD SEEBORG  
UNITED STATES DISTRICT JUDGE